

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

SureFunding, LLC,

Debtor.

Chapter 11

Case No. 20-10953 (LSS)

**NOTICE OF NOTEHOLDERS' CORRECTION TO THEIR REPLY IN SUPPORT OF
THEIR MOTION FOR AN ORDER CONVERTING THIS CASE TO CHAPTER 7**

The Noteholders,¹ through their undersigned counsel, respectfully file this correction to their Reply in Support of their Motion for an Order Converting this Case to Chapter 7 and respectfully state as follows in support thereof:

1. On October 13, 2022, the Noteholders filed their Reply in Support of their Motion for an Order Converting this Case to Chapter 7 [Dkt. 166] (the “Reply”).
2. Paragraph 15 of the Reply stated that Snell and Wilmer represented the Abernathys individually in the litigation filed by the receiver against the Abernathys.

¹ “Noteholders” are Brett Hatton, an individual; Earl Coronel, an individual; Autumn Wind Global Multi-Strategies Fund, LP, a Delaware Limited Partnership; Damon Gersh, an individual; Jason Eckenroth, an individual; Sherri R. Sands, as trustee of the Sherri R. Sands Revocable Trust, a Florida Trust; Glickfield Capital Management, LLC fbo M. Glickfield Dynasty Trust, a Maryland Trust; Glickfield Capital Management, LLC fbo Cheryl Newmark, a Maryland Trust; Glickfield Capital Management, LLC fbo Marla Schram, a Maryland Trust; Carrickfergus Investments Limited, a British Virgin Islands Company; Stephane Carnot, as Trustee of the Carnot Family Trust, a District of Columbia Trust; Dorsey and Whitney Trust Co., LLC, as Trustee of the Dylan Taylor 2011 Grantor Trust, a South Dakota Trust; Esecos, LLC, a Michigan Limited Liability Company; Sequis Group, LLC, a Michigan Limited Liability Company; Matthew Briggs, as Trustee of the Briggs Management Trust; Michael Rubenstein, an individual; June Farmer, an individual; Thomas Carl Myers, an individual; Richard L. Rogers, an individual; Neal J. Glickfield, as Trustee of the Neal J. Glickfield 2018 Trust, a Maryland Trust; Lineage, LLC, a Virginia Limited Liability Company; Charles B. Chokel, as Trustee of the Charles B. Chokel Trust u/a 4/21/92, a New Hampshire Trust; Brian Gray, an individual; HFJ Investments I, LLC, a Texas Limited Liability Company; Patricia B. Jones, as Trustee of the Patricia B. Jones Revocable Trust, a Maryland Trust; John B. Shaw as Trustee of the John B. Shaw 2012 Family Grantor Trust; and 1086 LLC, a Maryland Limited Liability Company.

3. This statement was based upon information provided to counsel for the Noteholders by the receiver. The receiver subsequently informed counsel for the Noteholders that he had misspoken and that Snell and Wilmer had only represented the Abernathys in the appeal of the receivership order.

4. While counsel for Noteholders has informed the Court and Debtors that this statement was made in error, Debtors continue to raise the issue and therefore the Noteholders file this notice to clarify the record.

Dated: December 12, 2022
Wilmington, Delaware

BLANK ROME LLP

By: /s/ Stanley B. Tarr

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